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January 30, 2023

**BY ECF**

Honorable Brian M. Cogan  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: United States v. Urooj Rahman, Case No. 20-CR-203**

Dear Judge Cogan:

I write with respect to the above-captioned case. The defendant, Urooj Rahman, was sentenced on November 17, 2022, to 15 months' imprisonment and a two-year term of supervised release. Ms. Rahman is scheduled to self-surrender to the custody of the Bureau of Prisons tomorrow, January 31, 2023.

First, we respectfully request that the Court correct its sentence with respect to the term of supervised release imposed. At sentencing, the Court imposed two years of supervised release. ECF No. 108, Judgment at 3 (Nov. 18, 2022). However, the statutory maximum term of supervised release that may be imposed for a violation of 18 U.S.C. § 371 is one year. See 18 U.S.C. § 3583(b), (e). As such, we respectfully request that the Court amend the sentence – and the Judgment and Commitment Order – to reflect the imposition of a term of one year or less of supervised release.<sup>1</sup>

Second, Ms. Rahman seeks to correct certain inaccuracies contained in recent court filings in this case:

- A recent filing suggests that Ms. Rahman's text earlier in the evening of May 29, 2020 regarding "[t]hrowing bottles and tear gas . . . lit some fires but were put out . . . fireworks goin and Molotovs rollin" indicates that Ms. Rahman was doing those things at the time. See ECF No. 111, at 18 (Dec. 2, 2022). As confirmed in Ms. Rahman's Presentence Report, that text was a "report[] from the protest."

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<sup>1</sup> We acknowledge that counsel should have noticed and asked to correct this error at sentencing, and we apologize to the Court for any inconvenience associated with the requested change to the sentence.

Honorable Brian M. Cogan

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PSR ¶ 13. The text reflected what Ms. Rahman was observing at the time and not her own conduct.<sup>2</sup>

- The same filing also states that Ms. Rahman's text to Mr. Mattis to bring gasoline to the protest was the "idea" to make Molotov cocktails. See ECF No. 111, at 18 (Dec. 2, 2022). In fact, Ms. Rahman texted that Mr. Mattis should bring other items and "maybe some gasoline." But Ms. Rahman did not suggest making or building a Molotov cocktail, and it was only when Mr. Mattis arrived, with gasoline, that the criminal conduct underlying Ms. Rahman's conviction occurred.

Ms. Rahman does not request that the Court take any action with respect to these factual clarifications. Moreover, the clarifications should not be interpreted as a failure to accept responsibility for her actions. As Ms. Rahman made clear at her sentencing, she knows that her actions on the night of May 29, 2020 were wrong and illegal. She regrets these actions totally and completely, and she accepts responsibility for what she did. She simply wishes for the record in this case to accurately reflect her conduct.

Thank you for Your Honor's attention to this matter.

Respectfully submitted,



Peter W. Baldwin

cc: All Counsel of Record (via ECF)

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<sup>2</sup> Ms. Rahman also denies hitting a police officer with a rock or a bottle; the circumstances surrounding Ms. Rahman's text on this topic were explained in Dr. Lebowitz's report, which accompanied Ms. Rahman's sentencing submission.